



Air Resources Board



Mathew Rodriquez
Secretary for
Environmental Protection

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

Edmund G. Brown Jr.
Governor

September 22, 2014

Mr. Jared Blumenfeld
Regional Administrator
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, California 94105

Dear Mr. Blumenfeld:

In response to the U.S. Environmental Protection Agency (U.S. EPA) initiative to speed action on revisions to the California State Implementation Plan (SIP), staff from U.S. EPA and the Air Resources Board (ARB) have been working together with the staffs of California's air districts to prioritize items for U.S. EPA action and identify submittals no longer appropriate for inclusion in the SIP.

The Eastern Kern, Siskiyou, Monterey Bay, and Yolo-Solano air districts have determined that a number of their local rules no longer need to be included in the SIP. These districts have requested that ARB withdraw the rules from the California SIP via the following letters (copies enclosed):

- August 6, 2014 letter from Glen E. Stephens, P.E., Eastern Kern Air Pollution Control Officer, to Kurt Karperos, Chief of the ARB Air Quality Planning and Science Division;
- September 3, 2014 letter from Patrick J. Griffin, Siskiyou County Air Pollution Control Officer, to Kurt Karperos, Chief of the ARB Air Quality Planning and Science Division;
- September 4, 2014 letter from Richard A. Stedman, Monterey Bay Air Pollution Control Officer, to Kurt Karperos, Chief of the ARB Air Quality Planning and Science Division; and
- September 4, 2014 letter from Mat Ehrhardt, P.E., Yolo-Solano Air Pollution Control Officer to Kurt Karperos, ARB Air Quality Planning and Science Division.

We have reviewed the district requests and are forwarding a list of the rules we believe are appropriate for withdrawal from the SIP at this time. For convenience, we have compiled into a single table (enclosed Table 1) a list of the rules that ARB is withdrawing from the SIP at the request of the air districts.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

Mr. Jared Blumenfeld
September 22, 2014
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If you have any questions, please have your staff contact Mr. Kurt Karperos, Chief,
Air Quality Planning and Science Division at (916) 322-5350, or via email at
kurt.karperos@arb.ca.gov.

Sincerely,



Richard W. Corey
Executive Officer

Enclosures

cc: See next page.

Mr. Jared Blumenfeld
September 22, 2014
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cc: Mr. Mat Ehrhardt, P.E.
Air Pollution Control Officer
Yolo-Solano Air Quality Management District
1947 Galileo Court, Suite 103
Davis, California 95618

Mr. Patrick J. Griffin
Air Pollution Control Officer
Siskiyou County Air Pollution Control District
525 South Foothill Drive
Yreka, California 96097

Mr. Andrew Steckel, Chief
Rulemaking Office
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, California 94105

Mr. Richard A. Stedman
Air Pollution Control Officer
Monterey Bay Unified Air Pollution Control District
24580 Silver Cloud Court
Monterey, CA 93940

Mr. Glen E. Stephens, P.E.
Air Pollution Control Officer
Eastern Kern Air Pollution Control District
2700 M Street, Suite 302
Bakersfield, California 93301

Mr. Kurt Karperos, Chief
Air Quality Planning and Science Division

Table 1: District Rules to be Withdrawn from California SIP

| Air District | Rule | Submittal Date | Description |
|---------------------|-------------|-----------------------|--|
| Eastern Kern | 210.3 | 7/23/1996 | Emission Reduction Banking |
| Monterey Bay | 202 | 5/31/2001 | Transfer |
| Monterey Bay | 210 | 12/12/2002 | Denial of Applications |
| Monterey Bay | 211 | 12/12/2002 | Appeals |
| Monterey Bay | 216 | 12/12/2002 | Permit Requirements for Wastewater and Sewage Treatment Facilities |
| Monterey Bay | 217 | 12/12/2002 | Annual Review of Permits |
| Siskiyou | 2.5 | 3/18/1987 | Expiration of Application |
| Siskiyou | 4.2 | 3/23/1988 | Nuisance |
| Siskiyou | 6.2 | 3/26/1990 | Standards for Permit to Operate |
| Siskiyou | 6.3 | 3/26/1990 | State Ambient Air Quality Standards |
| Yolo-Solano | 3.5 | 5/13/1999 | Emission Reduction Credits |
| Yolo-Solano | 3.11 | 3/26/1997 | Alternative Compliance |



Eastern Kern

Air Pollution Control District

Glen E. Stephens, P.E.
Air Pollution Control Officer

August 6, 2014

Mr. Kurt Karperos, Chief
Air Quality Planning and Science Division
California Air Resources Board
1001 I Street
Sacramento, California 95814

SUBJECT: Review of Outstanding Eastern Kern APCD SIP Submittals

Dear Mr. Karperos:

After discussion with California Air Resources Board (ARB) and Region 9 of the U.S. Environmental Protection Agency (EPA) staff, the Eastern Kern Air Pollution Control District (District) has determined Rule 210.3, Emission Reduction Banking does not need to be included in the California State Implementation Plan (SIP). Rule 210.3 was originally submitted for inclusion into the SIP July 23, 1996 but was not acted on. The District requests ARB withdraw the SIP submittal for Rule 210.3. This rule will continue to be enforced locally.

Should you have any questions regarding this matter, please contact Jeremiah Cravens, AQS II, at (661) 862-5250 or Cravensj@co.kern.ca.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Glen Stephens".

Glen E. Stephens, P.E.
Air Pollution Control Officer

GES: JC: db



COUNTY OF SISKIYOU

AIR POLLUTION CONTROL DISTRICT

PATRICK J. GRIFFIN
Air Pollution Control Officer

525 SOUTH FOOTHILL DRIVE
YREKA, CALIFORNIA 96097-3090
PHONE: (530) 841-4029
FAX: (530) 842-6690

September 3, 2014

Kurt Karperos, Chief
Air Quality Planning and Science Division
California Air Resources Board
1001 I Street
Sacramento, California 95819

Re: Request to Withdraw Siskiyou County Air Pollution Control District Rules from the California State Implementation Plan

Dear Mr. Karperos:

After discussion with staff from the California Air Resources Board (ARB) and Region 9 of the U.S. Environmental Protection Agency (EPA), the Siskiyou County Air Pollution Control District (District) has identified a number of rules we believe no longer need to be included in the California State Implementation Plan (SIP). We request that ARB withdraw the following rules from the SIP. The rules will continue to be enforced locally.

| Rule | Title | Date Submitted to EPA |
|------|-------------------------------------|-----------------------|
| 4.2 | Nuisance | 03/23/88 |
| 6.3 | State Ambient Air Quality Standards | 03/26/90 |
| 2.5 | Expiration of Application | 03/18/87 |
| 6.2 | Standards for Permits to Operate | 03/26/90 |

If you have any questions about this request, please contact Kimberly Sumner, Air Pollution Specialist of my staff by telephone at (530) 841-4030 or by email at ksumner@co.siskiyou.ca.us.

Sincerely,

PATRICK J GRIFFIN
Air Pollution Control Officer

C: Laura Lawrence, ARB
Andy Steckel, EPA Region 9



MBUAPCD

Monterey Bay Unified Air Pollution Control District
Serving Monterey, San Benito and Santa Cruz Counties

24580 Silver Cloud Court
Monterey, CA 93940

PHONE: (831) 647-9411 • FAX: (831) 647-8501



Celebrating 40 years of clean air.

September 4, 2014

Kurt Karperos, Chief
Air Quality Planning and Science Division
California Air Resources Board
1001 I Street
Sacramento, California 95814

Dear Mr. Karperos:

After discussion with staff from the California Air Resources Board (ARB) and Region 9 of the U.S. Environmental Protection Agency (EPA), Monterey Bay Unified Air Pollution Control District (District) has identified a number of rules we believe no longer need to be included in the California State Implementation Plan (SIP). We request that ARB withdraw the following rules from the SIP. The rules will continue to be enforced locally.

| Rule | Title | Submittal Date |
|------|--|----------------|
| 202 | Transfer | 05/31/01 |
| 210 | Denial of Applications | 12/12/02 |
| 211 | Appeals | 12/12/02 |
| 216 | Permit Requirements for Wastewater and Sewage Treat Facilities | 12/12/02 |
| 217 | Annual Review of Permits | 12/12/02 |

If you have any questions about this request, please contact Jaime Hernandez.

Sincerely,

Richard A. Stedman
Air Pollution Control Officer



September 4, 2014

Kurt Karperos, Chief
Air Quality Planning and Science Division
California Air Resources Board
1001 I Street
Sacramento, California 95814

SUBJECT: State Implementation Plan (SIP) Submittal Letter

Dear Mr. Karperos:

The Yolo-Solano Air Quality Management District (District) has been in discussion with EPA Region 9 regarding our SIP submittals and determined that several existing rules need to be withdrawn from the SIP. These rules will continue to be enforced locally. We request that ARB withdraw the following rules from the SIP:

| Rule | Title | Date Adopted or Amended | Date Submitted to EPA |
|------|--|-------------------------|-----------------------|
| 3.5 | Emission Reduction Credits | 9/13/96 | 5/13/99 |
| 5.1 | Procedure Before the Hearing Board | 2/23/94 | 10/19/94 |
| 3.11 | Alternative Compliance | 1/8/97 | 3/26/97 |
| 5.2 | Upset/Breakdown Conditions: Emergency Variance | 2/23/94 | 10/19/94 |
| 2.13 | Organic Solvents | 5/24/94 | 11/30/94 |
| 2.15 | Disposal and Evaporation of Solvents | ~1978 | 6/22/78 |
| 2.24 | Solvent Cleaning Operations (Degreasing) | 11/14/90 | 5/13/91 |
| 2.5 | Nuisance | ~1971 | ~1971 |
| 2.6 | Additional Exception | ~1971 | ~1971 |

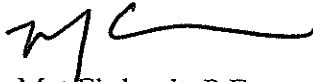
EPA Region 9 has proposed, and the District concurs, that Rules 3.5 and 3.11 listed above should be withdrawn from the SIP. Rule 3.11 provides an alternative mechanism for compliance with best available retrofit control technology requirements established by the California Health & Safety Code, and therefore is not a SIP requirement. The version of Rule 3.5 that is in the SIP (as Rule 3.14) incorporates the necessary elements of the emission reduction credit program (i.e., that credits be issued for emission reductions that are "real, surplus, quantifiable, permanent, and enforceable) into the SIP, so the amendment adopted in 1996 need not be incorporated into the SIP and can instead be withdrawn from consideration.

Rule 5.1 and 5.2 were proposed for removal from the SIP by EPA Region 9 on July 25, 1996 (FR 38664), on the grounds that these rules included administrative elements for variances that cannot properly be included in the SIP. Final approval of the withdrawal was published on June 27, 1997 (FR 34641), so the District requests that these rules be withdrawn from the SIP and removed from ARB's SIP Rules Log to avoid confusion.

Rules 2.13, 2.15, 2.24, 2.5, and 2.6 have previously been the subject of letters from the District requesting withdrawal, but no action has been taken yet. The requirements of rules 2.13, 2.15, and 2.24 are redundant with the requirements of Rule 2.31 (Organic Cleaning and Degreasing), as described in our letter of July 31, 2013, and can be withdrawn from the SIP. Rules 2.5 and 2.6 are intended to address local nuisance odor issues instead of the National Ambient Air Quality Standards, as discussed in our letter of August 1, 2013, and should never have been incorporated into the SIP. We therefore request that these rules be withdrawn from the SIP as well.

Thank you for your attention to this matter. If you have any questions, please contact Frank DeMaris of my staff at (530) 757-3650.

Sincerely,

A handwritten signature in black ink, appearing to be 'M Ehrhardt', with a long horizontal flourish extending to the right.

Mat Ehrhardt, P.E.
Air Pollution Control Officer

